

<p style="text-align: right;">Page 54</p> <p>1 of hotels in the Tucker precinct that have a high  2 crime rate.  3 And that is the list that we've talked  4 about --  5 A Right.  6 Q -- that you're looking at there,  7 Plaintiff's Exhibit 7.  8 Answer: Yes. Question: And which hotel is  9 at the top of the list? Answer: The United Inn.  10 Question: Do you understand that to mean the United  11 Inn had the highest crime rate in Tucker precinct of  12 all the hotels in Tucker? Answer: Yes, I can believe  13 that. Question: Did the crime that occurred at the  14 United Inn and Suites include commercial sex activity  15 like prostitution and sex trafficking? Answer: Yes.  16 Question: Did you consider commercial sex activity,  17 like prostitution and sex trafficking, to be common  18 at the United Inn and Suites? Answer: Yes.  19 Question: Did you consider commercial sex activity,  20 like prostitution and sex trafficking, to be a  21 problem at the United Inn and Suites from 2015 to  22 2021? Answer: Yes.  23 Did you hear what I just read?  24 A Yes.  25 Q Does that testimony surprise you?</p>	<p style="text-align: right;">Page 56</p> <p>1 prostitution on the property. Do you understand what  2 I read?  3 A No, can you just...  4 Q You want me to read it again?  5 A No, just rephrase it. I -- I'm --  6 Q Yes, sir. This question that was a  7 question I asked of United Inn and Suites was, admit  8 that law enforcement from DeKalb County Police  9 Department notified United Inn and Suites of  10 prostitution at the hotel. And the hotel responded  11 to this and made some objections, and then said  12 admitted. In other words, the hotel admitted that  13 the DeKalb County Police Department did notify the  14 hotel of prostitution on the property. Is that -- is  15 that something you're aware of, or no?  16 A Maybe when the thing occurred, then we  17 were aware of that, what's going on, yeah.  18 Q Did you participate in any conversations  19 with the DeKalb County Police Department officers  20 about prostitution on the property?  21 A Whenever we see like a unusual activity,  22 we just tell them so they can go and check what's  23 going on. That's the conversation we do. Yeah.  24 Q Well, I hear your answer, but I want to  25 focus a little more specifically on commercial sex</p>
<p style="text-align: right;">Page 55</p> <p>1 A Maybe they have more experience than we,  2 because we're not trained, just the police officer.  3 So, maybe they have a better eye.  4 Q Did you consider commercial sex activity,  5 that is sex for money, whether it's prostitution or  6 sex trafficking -- did you consider sex activity to  7 be common at the United Inn and Suites from 2017 to  8 2019?  9 A No.  10 Q Take a look at Plaintiff's Exhibit 4,  11 which we just looked at a second ago. And I want to  12 look at the response number 45, which is on page 15.  13 Mr. Shareef -- Mr. Islam, I'm going to read this to  14 you, Request 45. Admit that law enforcement  15 officials from the DeKalb County Police Department  16 notified you of prostitution on the property.  17 Response: Defendant objects to this request as it's  18 not limited at scope of time. Subject to this  19 objection and without waiving the same, admitted.  20 And what I can represent to you about that  21 answer, Mr. Islam, is that there were objections  22 made, but the answer provided at the end of the  23 objection says, admitted. In other words, admitting  24 that law enforcement officials from the DeKalb County  25 Police Department notified United Inn and Suites of</p>	<p style="text-align: right;">Page 57</p> <p>1 activity or prostitution or sex trafficking. Did you  2 ever specifically talk about those topics with DeKalb  3 County police?  4 A If there is any kind of like prostitution  5 going on? Because we don't even know what's going on  6 so we just tell them, so maybe you can go and check  7 with your experience, so...  8 Q Did you ever have a conversation with the  9 DeKalb County Police Department where they were using  10 the term "prostitution"?  11 A What? I'm sorry.  12 Q Where the DeKalb County Police Department  13 officers were using the term "prostitution" and  14 talking about prostitution on the property, did you  15 ever participate in conversations where that  16 occurred?  17 A Any kind like a meeting for -- regarding  18 that?  19 Q Meeting, phone call, in-person discussion.  20 A The discussion, yes, with the -- with  21 those officers, yes.  22 Q And the term "prostitution" was used?  23 A Yes.  24 Q What would they say about it?  25 A Whenever - because we don't know about</p>

<p style="text-align: right;">Page 58</p> <p>1 that exact thing, about the prostitution and other  2 statements. And maybe like somebody's doing some --  3 some kind of activity, so can you check.  4 Q And what would prompt you to call?  5 A Somebody wearing like inappropriate  6 clothes.  7 Q Anything else?  8 A Not really, no.  9 Q I mean, I'm just trying to figure out what  10 kinds of things would you have been seeing that would  11 prompt you to call and say, hey, I think there might  12 be something going on here?  13 A Sometimes if people in and out from any  14 room.  15 Q Do you recall having more than one  16 conversation with the DeKalb Police Department about  17 prostitution?  18 A Whenever we have problem, yes.  19 Q Did you ever have any communications with  20 the DeKalb Police Department in writing?  21 A No.  22 Q Or oral?  23 A Yeah, basically convey to the officers, so  24 they can convey their way.  25 Q During the time that you've been at the</p>	<p style="text-align: right;">Page 60</p> <p>1 walking to Room 101 of the hotel. She didn't have a  2 key to the room and left the officers waiting in the  3 room while she went back to the front desk to get a  4 key for having -- before having commercial sex. And  5 when she went back to the room, the undercover  6 officers arrested her.  7 Is this a report that you're familiar  8 with?  9 A No.  10 Q Do you agree that there was prostitution  11 at the United Inn and Suites as of August 2015?  12 A If it said that report, then we already  13 find out what's going on.  14 Q Well, my question was --  15 A Yes.  16 Q -- do you believe that there was  17 prostitution at the United Inn and Suites in  18 August -- -  19 A Of that report --  20 Q -- 2015?  21 A -- yes.  22 (Exhibit No. 9 was marked for  23 identification.)  24 Q (By Mr Bouchard) Showing you what's been  25 marked as Plaintiff's Exhibit 9. And this is June</p>
<p style="text-align: right;">Page 59</p> <p>1 United Inn and Suites, Mr. Islam, how many instances  2 do you believe there's been prostitution at the  3 hotel?  4 A I heard few of them, so -- and being  5 arrested when we find out what's going on.  6 Q Give me an estimate of how many instances.  7 A My knowledge, maybe five, six.  8 Q In the time -- in the entire time you've  9 worked --  10 A Yeah.  11 Q -- at the hotel?  12 A Yeah.  13 Q All right. Let's look at Plaintiff's  14 Exhibit 8 from Mr. Shareef's deposition.  15 (Exhibit No. 8 was marked for  16 identification.)  17 Q (By Mr. Bouchard) Showing you what's been  18 marked as Plaintiff's Exhibit 8, which is a police  19 report dated August 12th, 2015, Mr. Islam. And you  20 can see in the top left-hand corner it says, Incident  21 type: Prostitution. And I'll represent to you that  22 the long narrative on the next page, I'll represent  23 to you that it says that a woman was arrested for  24 prostitution at the United Inn after meeting two  25 undercover police officers in the parking lot and</p>	<p style="text-align: right;">Page 61</p> <p>1 2nd, 2017, police report, Bates-stamped Plaintiff  2 1379 to Plaintiff 1383.  3 Mr. Islam, this report, if you look at the  4 last page, refers to a man that was arrested after  5 beating a woman in Room 345 at the United Inn over  6 monies owed for sexual favors. Is this a report that  7 you're familiar with?  8 A No.  9 Q Do you agree there was prostitution on the  10 property in June 2017?  11 A I don't know. If this is their opinion,  12 so I -- I cannot say anything, so...  13 (Exhibit No. 10 was marked for  14 identification.)  15 Q (By Mr. Bouchard) Take a look at  16 Plaintiff's Exhibit 10, which is Bates-stamped  17 Plaintiff 1398 to 13 -- to 1401. Police report dated  18 June 20th, 2017. And this is a report, sir, that  19 documents police responding to a fight between a  20 prostitute and her pimp in Room 101 of the United  21 Inn. The pimp left the prostitute's room after the  22 fight to go stay in another woman's room at the  23 hotel.  24 Are you familiar with this report?  25 A No.</p>